

**Federal Defenders
OF NEW YORK, INC.**

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BY ECF

Hon. Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Schulte*, S2 17 Cr. 548 (PAC)

Dear Judge Crotty:

In response to the government's classified submission earlier today, and for the reasons cogently stated by Judge Ellis in *United States v. Rosen*, 487 F. Supp. 2d 703, 707-21 (E.D. Va. 2007), the defense continues to object to any trial exhibits (including, especially, documents that have long been publicly available on WikiLeaks.org) being shown to the jury in one form but disclosed to the public in a different form (or withheld from the public altogether). Allowing the government to proceed in the manner it proposes would not only violate CIPA, but would deny Mr. Schulte his constitutional rights to a fair and public trial.

Respectfully submitted,

/s/
Edward S. Zas & Sabrina P. Shroff
Counsel for Joshua A. Schulte